

SHEA & GOULD

SUITE 700

1775 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20006

(202) 833-9850

TELEX 888996

TELECOPIER (202) 833-1992

December 1, 1989

By Federal Express

Dianne G. Moretzsohn, Esq.
Alco Standard Corporation
825 Duportail Road
Chesterbrook
Wayne, PA 19087

Re: ECC Settlement

Dear Ms. Moretzsohn:

As we discussed today, I am enclosing the ECC Settlement package for your review. To enable you to quickly locate the pertinent documents let me point out that the signature page for premium settlers is located on page 57 of the Consent Decree, document #1 in your package. The premium trust agreement is the 468B Trust, document #3 in your package. It is not necessary to execute the Trust Agreement at this time. However, please have the appropriate officer execute the signature page for the Consent Decree and send the original by Federal Express to Charles McKinley, Assistant Regional Counsel, USEPA, Region V, 230 South Dearborn Street, Chicago, IL 60604. Please send to us by fax a copy of your cover letter to Charles McKinley and the signature page. Our fax numbers are (202) 833-9850 and (202) 466-2660.

As we discussed on the phone today, a total of 35,310 gallons was attributed by EPA to Alco Corporation. This allocation included Synthane-Taylor, Brown & Bigelow and Atwater Group. We have received a signature page from Alco Industries on behalf of Synthane-Taylor for its portion of the gallonage (30,030 gallons). You told me today that Alco Standard's subsidiary, Paper Corporation of America, will take responsibility for the remaining 5,280 gallons, attributable to Brown & Bigelow and Atwater Group.

1/ Page 3 of our original spreadsheet (document #6) reflects this figure. The enclosed revised spreadsheet has separated Synthane-Taylor from the other Alco entities.

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As I also explained to you there are two choices the company can make regarding the settlement. One is a regular settlement for approximately \$3,077 and the other is a premium settlement for approximately \$4,858. As you review the Consent Decree you will see that the premium settlement provides a greater protection from liability. Please note, however, that as explained in the memorandum dated August 31, 1989, this settlement is not a release from liability in connection with "Third Site" or Great Lakes Asphalt site. If you have any questions about any of the documents you have received, please feel free to call me.

Please let me know if the executed signature page cannot be sent by Federal Express to the EPA on Monday. Thank you for your cooperation in this matter.

Very truly yours,



Laurel A. Bedig

cc: Charles McKinley